



# SAN DIEGO COUNTY OFFICE OF EDUCATION

6401 LINDA VISTA ROAD, SAN DIEGO, CALIFORNIA 92111-7399 (858) 292-3500

Superintendent of Schools  
Randolph E. Ward, Ed.D.

July 9, 2010

To the Federal Communications Commission,

We commend the Federal Communications Commission (FCC) for originally establishing the E-Rate program and now seeking ways to improve this critical policy. The San Diego County Office of Education (SDCOE) realizes the exceptional value of E-rate funding, and has utilized it to provide high-quality services to students that would not be possible otherwise. Per your request, we respectfully submit our comments on two aspects of the E-Rate reform currently under consideration.

*1. Wireless Services Outside of School: We propose to adopt the National Broadband Plan recommendation to provide full E-rate support for wireless Internet access service used with a portable learning devices that are used off premises. We seek comment on this proposal.*

We (SDCOE) believe the FCC should be applauded for acknowledging that the E-rate regulations, in their current form, prevent students from fully-utilizing learning opportunities that the devices can provide at home. We believe that a wireless computing device, utilized by students for educational purposes inside and outside the school walls, should have an E-rate eligible broadband Internet connection.

The concept of “eligible locations” is obsolete and increasingly removed from the way today’s students learn, study, and live. The educators and students, like society in general, are utilizing an increasing amount of mobile technologies to engage in school-related activities at any time and from anywhere. Rather than trying to sort out what constitutes an eligible physical location, the focus of determining eligibility should focus on whether the service being used is central and proximate to educational purposes.

E-rate was designed to connect students’ learning environment to the Internet and other telecommunication methods. In the 21st century, the learning environment reaches beyond the classroom and E-rate funding should be modified to reflect the needs of students anywhere.

*2. We propose to modify our rules so that we can lessen the digital divide between those who are fortunate enough to subscribe to broadband at home and those who do not.*

We believe the FCC’s National Broadband Plan wisely recognizes that advances in technology have enabled students to continue to learn well after the school bell rings and students go home. Districts in San Diego and across the country are utilizing instructional software programs to provide additional learning opportunities for students. Most of these programs use a web-based format to empower student learning from anywhere. Yet, they must have access to a computer and the Internet to take advantage of these opportunities.

## Board of Education

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**SERVICE AND LEADERSHIP**



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Far too many children throughout the United States are at a learning disadvantage due to the inability to use broadband Internet from home. This is true for all communities, including suburban or affluent. Students who are to be successful in today's economy require all stakeholders to implement affordable broadband solutions that ensure connectivity for all students. Lack of attention to this growing issue will result in a widening achievement gap and digital divide. Some children will have the resources necessary to be successful, and some will not.

Your support and understanding is appreciated on this highly-important matter. It is vital that we continually evaluate and update our well-intentioned policies such as E-rate to ensure these powerful programs continue to make a difference for our students and country.

Sincerely,

Stephen Clemons  
Assistant Superintendent/Chief Technology Officer  
San Diego County Office of Education

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